

Environmental Protection Agency

4500 S. Sixth Street Springfield, IL. 62706 Ph. (217) 786-6892

December 29, 1981

Refer to:

Compliance

Gates Rubber
P. O. Box 1196
Knoxville Road
Galesburg, Illinois 61401

ATTENTION: Mr. Robert Siebert

Dear Mr. Siebert:

An inspection of the above facility was conducted by a representative of the Illinois Environmental Protection Agency (IEPA) on September 21, 1981. A copy of the inspection report is enclosed. The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) as amended. Based on the information obtained during the inspection, we have determined that the above facility is exempt from RCRA.

Therefore, since your facility is not regulated under RCRA, we recommend that you submit a letter to U.S.E.P.A., Region V, RCRA Activities, P. O. Box 7861, Chicago, Illinois, 60680, requesting that your EPA Form 8700-12 Notification of Hazardous Activity be withdrawn. Copies of this letter should also be sent to U.S.E.P.A., Enforcement Division, Attention: Water and Hazardous Materials Compliance Section, 230 South Dearborn Street, Chicago, Illinois, 60604, and to the Illinois Environmental Protection Agency, Division of Land/Noise Pollution Control, 4500 South Sixth Street Road, Springfield, Illinois, 62706.

EPA Region 5 Records Ctr.

Gates Rubber Page 2 December 29, 1981

Your cooperation and efforts in this matter are appreciated. Should you have any questions about the report or letter, please contact Glenn Savage at the above number.

Sincerely,

Monte M. Nienkerk

Monte M Nierkerk

Central Region Manager
Land Field Operations Section
Division of Land/Noise Pollution Control

MMN/GDS/cp

Enclosure

cc: VDLPC Division File

DLPC/FOS, Central Region U.S.E.P.A./Region V

ISS

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

ILD 005230370

ENVIRONMENTAL PROTECTION AGENCY $\frac{L \ P \ C \ F \ C \ O \ 5 \ 5}{(1)} \frac{C}{(8)} \frac{C}{(9)}$ OBSERVATION REPORT - SITE INVENTORY NO. $\underline{G} \ \underline{E} \ \underline{N} \ \underline{E} \ \underline{R} \ \underline{A} \ \underline{L} \ \underline{-}$ (11)

KNOX	CO L.P.C.	Region # C	Date <u>0</u> 7 / 2 <u>1</u> / 8 1
GALESBURG	1 GATES RUBBER		(20) (25) Letter Sent (Yes or No) $\frac{\checkmark}{(26)}$
(Location) Samples Taken: Yes ()	No (X) Time: From	om <u>09:30A</u>	Weather To's clear (26)
Ground Water() Surface(Photos Taken: Yes ()			Inspector $\frac{G}{(27)}$ $\frac{D}{}$ $\frac{S}{(29)}$
Previous Inspection OPERATIONAL STATUS: Operating Temporarily Closed () Closed Not Covered () Closed and Covered ()	Previous Cor TYPE OF OPERATION Landfill Random Dump Other Quantity Received	: () Storage () Salvage (**X** A.C.D.	Site Open: Yes(X) No() AUTHORIZATION: () E.P.A. Permit () () Variance () () 21(e) () Board Order () Illegal (5) ()
IMPROVED			LPC 4 1/79 5,000
SAME			T(C) and D
DETERIORATED	0.1.		I(S) or D <u>5</u> (62)
GENERAL REMARKS: An	Intern Status It		Was conducted on Valerhung Robert
Siebert Quality C representate the p	ation Manager, wa lant. Therram -	P117-was Install However, the	so the lagrandous
has changed the	to of an acutaly	to 0244 they	waste does not meet
INTERVIEW: was the		inner 1	hich contained the naw
moteral, this	m. This waste is	also subject to	
generatory 100	sion as defined in	& of the waste &	le site com le considerel
societies + he	laccumulation. Also	A de la co	in in the same
Robert Disbert.	it the facility. (Se	e information sub	mitted to Agency by
DIAGRAM: Facility	is exempt from RC	RA.	
		_	
		_	

	(If A was answered Yes, then complete	e the following as applicable.)
1.	Exporting Hazardous waste, has a generator:	
	a. Notified the Administrator in writing?	
	b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	
	c. Met the Manifest requirements?	/
2.	Importing Hazardous Waste, has the generator:	
	Met the manifest requirements?	
	VIII. Remark	<u>s</u>
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REMARK	:s:	
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RECEIVED

DEC 10 1981

STATE OF ILLINOIS

The Gates Rubber Company Galesburg Division

P. O. Box 1196 Galesburg, Illinois 61401 (309) 343-7171

December 16, 1981

Illinois Environmental Protection Agency Glenn D. Savage, Jr. Environmental Protection Specialist Land Field Operations Section - Central Region Division of Land/Noise Pollution Control 4500 South Sixth Street Road Springfield, IL 62706

Re: The Gates Rubber Company
EPA I.D. Number: ILD005230370
Our telephone conversation on Wednesday, 12/16/81

Dear Glenn:

Attached you will find copies of the letters you requested covering the chemicals used by The Gates Rubber Company which have been reclassified by the federal government.

The specific material involved at the Galesburg operation was EPA Material P117-Thiuram.

Regards,

Quality Control Manager

RS:jas

cc:

Bob Bensching - Eng.
Paul Hinkson - Galesburg

November 25, 1980

To:

Bob Siebert - Galesburg

From:

E. W. Karger - PEPP

Subject: Hazardous Waste Modifications

I have received word from the RMA representative, in Washington, that EPA has officially announced on November 25, 1980 the following changes in hazardous waste designations:

- 1. N nitrosodiphenylamine EPA Material P083 has been deleted from the hazardous waste catagory. (Gates Raw Material 32-8003). This material previously had to have its containers and inner liners disposed of as a separate material. All hazardous waste restrictions are, therefore, eliminated.
- 2. All thiuram materials (EPA material P117) except bis (dimeythylthiocar amoyl) disulfide have been changed from the acute hazardous list (261-33(e)) to the toxic list (261-33(f)). Gates raw materials 32-3211, 32-3212, 32-3271 and 32-3294 are, therefore, moved to the toxic list. This means the containers and inner liners do not have to be separated and disposed of as a hazardous waste.

EWK:dm

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DEC 18 1981

STATE OF ILLINOIS

cc:

R. K. Bensching - Eng.P. Hinkson - Galesburg

February 26, 1981

To:

Bob Siebert - Galesburg

From:

E. W. Karger - PEPP

Subject: Hazardous Waste

Federal EPA regulation 40 CFR 262.41 requires an annual report of hazardous waste off site shipment. The EPA on January 26, 1981 indicated that NO ANNUAL REPORT FOR CALENDAR YEAR 1980 will be required.

The Federal EPA also took action on November 25, 1980 to remove some materials from the hazardous waste designation (list 261.33(e) and 261.33(f)) and to revise the status of other materials. These revisions affected only Gates plants where rubber mixing takes place or urethane products are produced.

The EPA revisions did, however, affect some of the general directions which were issued in "PEPP Guidelines for Hazardous Waste". Revised "General Directions, EPA 261.33(e), and 261.33(f)" sections are, therefore, included with this interhouse and should be entered in your guidelines booklet.

EWK: dm

Encl: Siebert

File: Hazardous Waste

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DEO 19 1901

3. List 261.33(e) Acute Hazardous Waste

(EPA per Federal Register November 25, 1980 - pages 78541-78542).

A. NEW DEVELOPMENT

The following materials and their containers and/or inner liners formerly considered hazardous waste HAVE BEEN REMOVED from this acute hazardous list.

P083 N-Nitrosodiphenylamine Gates Raw Material 32-8003 (Retarder 8003)

P117 Thiuram
Gates Raw Materials 32-3211, 32-3212, 32-3271, 32-3294

B. GATES INVOLVEMENT

No materials used at Gates are on the list amended November 25, 1981.

PECEIVED

DEC 18 1901

cc: R. K. Bensching - Eng.
Paul Hinkson - Galesburg

January 7, 1981

To:

Bob Siebert - Galesburg

From:

E. W. Karger - PEPP

Subject: Hazardous Waste Revisions

On November 25, 1980 the EPA made changes to the status of several materials on the list of hazardous materials. These included:

- 1. P083 N Nitiosodiphenylamine (Gates Raw Material 32-8003)
 This material was previously on the ACUTE HAZARDOUS WASTE list 261.33(e) and has been completely removed from all hazardous waste lists (Reference attached page 78533).
- 2. Pl17 Thiuram (Gates Raw Materials 32-3211, -3212, -3271, -3294). Only the material bis (dimethylthiocarbamoyl) disulfite is considered as hazardous. That material has been judged less hazardous and is included on list 261.33(f). I.D. number has been changed to U244. (Reference attached page 78534).
- 3. U238 Urethane

Only the material "ethyl carbamate (urthan)" is considered hazardous. Polyurethanes are not considered hazardous. (Reference attached page 78534).

The revised paragraphs 261.33(e) and 261.33(f) are attached (pg. 78541-78544).

EWK:dm

(2).

Encl: Siebert Karger

File: Hazardous Waste

PECEIVEL

DEC LÓ 1981

1. Finalization of Chemical Product Names in § 261.33 (a) and (f)

A. The changes made in response to comments on specific listings are described summarily below. More detailed explanations are contained in the revised Background Document.

	Compound name	Action taken	Reason
019 and U160	2-Butanone peroxide (Methyl ethyl kelone peroxide)	Deleted from § 261 33(a). Remains in § 261 33(f).	
•	•	Added (R) designation.	 de, synonyms for the same compo takenty included in both the 5.251
• .			lists. This compound does and the
•			for listing as an acutery hazarded er, the compound's oral (rat) Laid
		<u>-</u>	qualifies it for continued inclusion
•		•	Moreover, the compound is reactive
025	1-(p-Chloroberzoyi)-5-methoxy-2-methylindoie-3-	Moved from § 261.33(e) to § 261.33(f)	oxidizer. After evaluating the data supplied by
	scetic acid.		which indicated that the correct
	• • • •		value for the subject compound in indomethacin) is 1100 mg/kg, no
•	•		mg/Kg, the Agency concluded the
		•	not pose an acute hazard. How
•	•		Agency's Carcinogen Assessme concluded that substantial evider
•	•	·	glandity exists for incomethecin,
	Cyanogen bromide	Moved from § 261.33(e) to § 261.33(f)	remain listed under § 261,33(f) ss to The LCSO value cited in the May 11
	Alexander Resident Control of the Alexander Co		Document was incorrect. According
-	· ·		the compound does not meet the
			ing as an acutely losso waste. How bromide's inhalation (rat) LC50 of
:			only slightly less tone than the s
•		•	acutery nazardous waste-qualifier
***** , , ,	-	••	as a hazziroous waste, it thus under \$251,33(f) as U246.
x15	2,4-Dicholorophenoxyscetic acid [2,4-D]	Moved from § 261,33(e) to § 261,33(f) and lieting	Re-evaluation of this using in light of
-	_	clarited.	during the commant period inco
		•	compound does not meet the crite an acute hazard. Since the toxic
	,		well recognized (for example, it is
	•		im Primary Consing (Year Standa) compound is listed as a hazardo
		•	*§ 261.33(f) as U240.
•			The active pessoon (CJH,(CH,OCH,
			marketed commercially in a number lorms. To clarify that the isong is
	A Commence of the Commence of		these various forms, the assing
			been clarified by explicitly including
052	Ethylcyanda	Deleted	and esters. Listing dubucated P101 listing.
053	Ethyleneciamene	Deleted	LDLo value cried in the May 19th 9a
			ment was incorrect. New data in
			COMMONING & LINEARY IN THE 4 IS.
			compound is unikely to bose a sw \(\frac{1}{2} \) human health or the environit
			to human hearth or the environm waste is mismanaged, so the wast
701	Hexachio/coropene	Moved from § 261,33(e) to § 261,33(f)	to human hearth or the environing
XST.	Hexachio/opropene	Moved from § 261.33(e) to § 261.33(f)	to human hearth or the environity waste is invismanaged, so the wast been delated from § 261.23. The LCSD value cited in the May 1 Document was incorrect. According
oet	Hexachio/opropene	Moved from § 261.33(e) to § 261.33(f)	to human hearth of the environm waste is mismanaged, so the wast been delated from 4.261.33. The LCSO value cited in the May 1. Document was mooment. According the compound does not meet the
X91	Hexachio/opropene	Moved from § 261.33(e) to § 261.33(f)	to human hearth of the environm waste is mismanaged, so the wast been delated from § 251.20. The LCSD value cited in the May 1 Document was incorrect. According the compound does not meet the ling as an accitent food with hexal condropropene's inhalation.
291	Hexachie/opropene	Moved from § 261.33(e) to § 261.33(f)	to human health of the environity waste is mismanaged, so the waste been devated from § 281:33. The LCSG value cited in the May 1. Document was moorned, According the compound does not meet the ing as an accrety foxic with hexal-concropropens's inhaiation 2.4 mg/l/hr—only slightly less.
X8T	Hexechic/corropene	Moved from § 261.33(e) to § 261.33(f)	to human hearth of the environm waste is mismanaged, so the wast been delated from § 251.20. The LCSD value cited in the May 1 Document was incorrect. According the compound does not meet the ling as an accitent food with hexal condropropene's inhalation.
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099	Narrogen peroxide	Deleted	to human heath or the environit waste is mismanaged, so the waste been deleted from § 281,23. The LCSO value cited in the May 1 Document was incorrect. According the compound does not meet the ing as an accurey fonce without a conformal property assenced from \$2.4 mg/l/hr—only slightly less standard for an accurey hazardout field in the May 1 Document was incorrect. No information as a hazardout remains beted under § 281,33(f) at listing disponded PO78 listing. The LCSO value cited in the May 1 Document was incorrect. No information was seen deletad from § 261. The LCSO value cited in the May 1 Document even if it was mismanagions has been deletad from § 261. The LCSO value cited in the May 1 Document was incorrect. New call the compound is unlikely to pothers to human health or the envitte waste is mismanaged. This coloridate to human health or the envitte waste is mismanaged. This coloridate to permit the use of this compound by the decision of the Poot sization to permit the use of this cindinated food additive. After renewing in more detail the a the Agency has concluded the phenol does not meet the criteria faziroous waste (see Listing Sament for Wood Presenving, as ments, November 1980). However waste 4261,33(f) as UZ-42.
	Nitrogen peroxide. Ni-hitrosodiphenylamena Okeyl stochol condensed with 2 males of ethylene oxede.	Deleted	to human heath or the environity waste is mismanaged, so the waste been delated from § 281:33. The LCSG value cited in the May ? Document was incorrect. According the compound does not meet the ing as an actively food with heat of the compound does not meet the ing as an actively food with heat of the compound does not meet the ing as an actively food with heat of the man standard for an actively fastering standard for an actively fastering delocated PO78 listing delocated PO78 listing delocated PO78 listing. The LCSG value cited in the May ? Document was incorrect. No into entry evaluable which shows that it as significent threat to human heartonnent even if it was mismanaged fore has been deleted from § 261: The LCSG value cited in the May ? Document was incorrect. New dather compound is unlikely to pothest to human hearth or the envite waste is mismanaged. This coponed by the decision of the Poot stration to permit the use of this clinifications waste (see Lcsn) get ment, for Wood Preserving, resident, for Wood Preserving, resident, November 1990). However well recognized and the waster wooder § 291:33(f) as U242. The LCSG value cited in the May ! Document was incorrect. New as
096	Narrogen peroxide	Deleted	to human hearth or the environing waste is mismanaged, so the was been delated from § 281,23. The LCSO value cited in the May 1 Document was incorrect. According the compound does not meet the ing as an acutery food with heavy conforcements a shallador 2.4 mg/I/I/I—only signify less standard for an acutery hazardor field in the standard for an acutery hazardor field in the May 1 Document was incorrect. No sittle entity svaluable which shows that a significant threat to human heat of the may 1 Document was incorrect. No sittle entity svaluable which shows that a significant threat to human heat of the may 1 Document was incorrect. New do the compound is unlikely to both the top of the standard firm § 261. The LCSO value order in the May 1 Document was incorrect. New do the compound is unlikely to both the standard food additive. After renewing in more detail the it indirect food additive. After renewing in more detail the it indirect food additive. After renewing in more detail the it indirect does not meet the order hazardous waste (see Listing Silment for Wood Presserving, rements, Neverboar 1930). However was recognized and the waste in user § 291,33(1) as 10242. The LCSO visible cited in the May 1 The LCSO visible cited in the May

1050

L. Finalization of Chemical Product Names in § 261.33 (e) and (f)—Continued

A. The thanges made in response to comments on specific listings are described summarily below. More rietailed explanations are contained in the revised Background Document.

EPA hazardous waste No.	Compound name	Action taken	-Research
117	Theren	1Moved from \$ 281,03(e) to \$ 281,03(f) and fisting	According to the NICSH "Recistry of Toxoc Effect
****		 changed to clarify the specific waste being regu- 	of Chemical Substances", thuram is a synony for bistomethytthiocarbamoyth disulfide. Col
		lated.	ments were received which indicated that off
	-		compounds were also known as "linuralitis", i
*/ - 2.5			have accordingly changed the listing "thuram" clarity that the intended compound
			"bu(dimetry/thiocarbamoyl) disulfide".
			Secondly, the LDLo data cited in the May 19
			Background Document was incorrect. According to the new data, the waste does not meet
		-	standard for an acutely hazardous waste. How
	•		er, basidimemytthiocarbamoyli disulfice's synen
			tic action with alcohol could pose a substar hazard to human health if the waste was mism
	•	the state of the s	aged and, as a result, contaminated direct
		<u>.</u>	water. Thus the compound has been listed \$251,33(f) as U244.
040-and U065	. Chanudibromomethens and Dibromochlorom	erhane Deleteri	After recvaluating the evaluable environmental :
		,	toxicological information, the Agency has cond
× .			ed that the information is not conclusive endi- to justify retaining the listing. Pending receipt
	•	_	additional data, the waste has been remo
			from inclusion under § 261.33.
34 <u></u>	Chloroform	Deleted (1) designation	 Mistakeny included. Chloroform does not have flash point below 60°C.
100	_ Demotry/retrosamine	Deleted	Acutely toxic and remains listed as P982.
104	24-Dantroonanol	do	Acutery toxic and remains listed as P048.
154	. Memanoi	Changed to (I) designation	, 'After consistency the comments received, Agency has concluded that it has insufficient
		-	formation to justify asting methanol for toxic
		`	 However, since it has a flash point of 11°C, it remain listed under §251,33(f) as an ignital
•			waste.
151	. Mothyl testutyl ketone	Changed to (i) designation	. After considering the comments received.
, -			Agency had concluded that it has insufficient formation to justify listing methyl isobutyl keta
			for toxicity, however, since it has a fash point
		•	22.8°C, it will remain listed under § 251.33(f).
197	_ Dunonge	Changed to p-benzoquinone	 As the May 19th Background Document moice: the Agency's evalable toxicological data refer
		-	to p-berzogumone only. The original sisting
	Section 2	and the first the same and the same of the	"Quinones" thus was over-inclusive. We are
	•		Earthingly revising the listing describion. Appen A to the May 19th listing Background Docum
<u> </u>			summarizes adverse health and environmental
1909	Secretaria	Added to listing " and salts."	fects associated with p-benzodunorie. The May 19th Background Document was intend
		Acces to issuing Site state.	to include both the parent and its salts, sa
	. · · · · · · · · · · · · · · · · · · ·		normal commercial use includes (and is known
			include) both forms, in light of this common usage, we do not believe that any notice a
• *			comment issues are present.
			The arguments that sacchann is not carcinoge
•			were not deemed persuasive enough by Agency to warrant deletion from §261.33
	ı		That sacchann poses a significant caronoge
*	-		hazard is amply demonstrated by the warms that are required by the Food & Drug Administ
•	•		then to appear on any food to which sacchark
229	Trichloroffworornethans	Pelvind	added.
232	Uretrane	Listing description modified	 Listing dublicated U121 Isting. The original listing of urethane has been changed
		•	read "ethyl carbamate (uretnan)" to indicate m
		•	clearly that the Fsting does not refer to either polymers commonly known as "polymethanes"
-		•	their precorsors.
ZN	_ Xylens	Changed to (I) designation	. Xylene was misrakingly bated as toxic instead of
•	•	-	ignitable. While invene does not appear to pos sufficient toxicity hazard for listing as a to
		•	waste, as the May 19th Background Document
	• :		dicated, sylene is an ignitable waste due to flash point of 27°C.
			recent power on a / ha
B. In addition to the same result of the Agency	above changes made in response is review of the interim final regul	to comments, the following changes, describitions.	bed summarily below, have been ma
EPA hazerdous waste No.	Compound name	Action taxen	Reason
006	Aluminum phosphide	Added (T) designation	In addition to its reactivity toward water (indicates
*C30	Cyanice sait muxtures not otherwise specifier	d Modified listing description	the May 19th Bacoground Document), the waite also acutely loxic because of its toxicity. (T) designation had been omitted shadvertently. Clarify the meaning of the term "oyanides" in to it a comment which indicated that the usi
<u></u>	Femc cyanide	Deleted	might be misunderstood. Listing duplicated P030 listing.



§ 261.33 Discarded commercial chemical products, off-specification species, containers, and spill residues thereof.

. The following materials or items are hazardous wastes if and when they are discarded or intended to be discarded:

(a) Any commercial chemical product, or manufacturing chemical intermediate having the generic name listed in paragraphs (e) or (f) of this section.

(b) Any off-specification commercial chemical product or manufacturing chemical intermediate nich, if it met specifications, would have the generic name listed in paragraphs (e) or (f) of this section

(c) Any container or inner liner removed from a container that has been used to hold any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraph (e) of this section, unless:

(1) The container or inner liner has been triple rinsed using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate; or

(2) The container or inner liner has been cleansed by another method that has been shown in the scientific literature, or by tests conducted by the generator, to achieve equivalent removal: or

(3) In the case of a container, the inner liner that prevented contact of the commercial chemical product or manufacturing chemical intermediate with the container, has been removed.

(d) Any residue or contaminated soil. water or other debris resulting from the cleanup of a spill, into or on any land or water, of any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraphs (e) or (f) of this Section. [Comment: The phrase "commercial chemical product or manufacturing chemical intermediate having the generic name listed in . refers to a chemical substance which is manufactured or formulated for commercial or manufacturing use which consists of the commercially pure grade of the chemical, any technical grades of the chemical that are produced or marketed, and all formulations in which the chemical is the sole active ingredient. It does not refer to a material, such as a manufacturing process waste, that contains any of the substances listed in paragraphs (e) or (f). Where a manufacturing process waste is deemed to be a hazardous waste because it contains a substance listed in paragraphs (e) or (f), such waste will be listed in either §§ 261.31 or 261.32 or will be identified as a hazardous waste by

the characteristics set forth in Subpart C of this Part.

(e) The commercial chemical products or manufacturing chemical intermediates, referred to in paragraphs (a) through (d) of this section, are identified as acute hazardous wastes (H) and are subject to the small quantity exclusion defined in § 261.5(e). [Comment: For the convenience of the regulated community the primary hazardous properties of these materials have been indicated by the letters T (Toxicity), and R (Reactivity). Absence of a letter indicates that the compound only is listed for acute toxicity.] These wastes and their corresponding EPA Hazardous Waste Numbers are:

Hazardous waste No.	Substance
P023	Acetaldehyde, chloro-
P002	Acetamide, N-(aminothioxomethyl)-
	Acetamide, 2-fluoro-
P058	Acetic acid, fluoro-, sodium salt Acetimidic acid. N-{(methylcar-
rvoo	bamoyi)oxy)thio-, methyl ester
P001	3-(alpha-aceternylbenzyl)-4- hydroxycournerin and saits
P002	1-Acetyl-2-thioures
P003	
P070	
P004	
	Aluminum phosphide
	5-(Aminomethyl)-3-isoxazolol
P008	
	Ammonium picrate (R)
P010	
P012	Arsenic (III) oxide
P011	
	Arsenic pertoxide
P012	
P054	
P013	Banum cyanide
	Benzenemne, 4-chloro-
	Benzena, (chloromethyl)-
	1,2-Benzenediol, 4-(1-hydroxy-2-(methyl-
4	ammolethyl]-
P014	
P028	Benzyl chloride Beryllium dust
P015	Bis(chloromethyl) ether
P017	
P018	
P021	Calcium cyanide Camphene, octachloro-
	Carbanimidoseienoic acid
P022	
P022	Carbon disulfide
P095	
P033	Chloroaceteidehyde
P024	
P026	1-(o-Chlorophenyl)thioures
P027	3-Chloropropionitrile
P029	Copper cyanides Cyanides (soluble cyanide salts), not else-
P030	where specified
P031	Cyanogen
P033	Cyanogen chloride
P036	Dichlorophenylarsine
P037	Dieldrin Diethylarsine
P038	O,O-Diethyl S-(2-(ethylthio)ethyl) phos-
	phorodithioate
P041	Diethyl-p-nitrophenyl phosphate
P040	O.O-Diethyl O-pyrazinyl phosphorothicale
P044	Disopropyl fluorophosphate Dimethoste
P045	3,3-Dimethyl-1-(methylthio)-2-butanone, O-
	[(methylemino)carbonyl] oxime
P071	O.O-Dimethyl O-p-nitrophenyl priosphoro-

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waste No.	Substance
	
	Dimethylnmosemine
	alpha, signa-Dimethylphenethylemine
	4.6-Dinitro-o-cresol and salts
P034	4.6-Dinitro-o-cyclehexylphenot*
P046	2.4-Dimitrophenos
P020	Dinoseb
P085	Dionosphoramios, octamethyl-
P039	
P049	
	Dithopyroohosphonic acid, tetraethyl ester
P050	Endosuitas
P088	Endothall
P051	
P042	
P046	Ethanamine, 1.1-dimethyl-2-phenyl-
P084	Ethenamine, N-methyl-N-nitroso-
P101	ctnyl cyanide
P054	EITHIGHITING
PC97	
P056	Fluorine -
P057	Fluoroacetamide
7035	Fluoroacetic acid, sodium salt
P060	Fulminic acid, mercury(ii) sait (R.T)
P059	
P051	1,2,3.4,10.10-Hexachloro-€,7-epoxy-
	1,4.4a,5.6.7,8.8a-octahydro-endo-endo-
0007	1,4:5,8-dimethanonaonthalene
P037	1.2,3.4,10,10-Hexachloro-6,7-epoxy-
	1,4,48.5,6.7.8,8a-octahydro-endo,exo-
	1,4:5,8-demethanonephthalene
P060	1.2,3,4,10,10-riexachioro-1,4,4a,5,8,8a-
	hexahydro-1,4:5,8-endo, endo-dimeth-
	anonaphinelene
P004	1,2,3,4,10,10-Hexactrioro-1,4,4a,5,8,8a-
	hexanytiro-1.4:5.8-endo,exo-
	dimethanonaphthalene
P060	Hexachloronexahydro-exo,exo-
	dimethanonaphthalene
P062	Hexaelityi letrapnosphate
P116	Hydrazinecarbotnioamide
9068	Hydrazinecarbothioamide Hydrazine, methyl-
P063	Hydrocyanic acid
	Hydrogen cyenide
P096	Hydrogen phosphide
P064	Isocyanic acid, methyl ester
P007	3(211)-isoxezoione, 5-leminomethyl)-
F092	Mercury, (acetato-O)onervi-
P065	Mercury fulrimete (R,T)
P016	Methana, sorvins(chioro-
P112	Methane, tetranitro- (R) -
P: 18	Methanethici thenion.
P059	4.7-Methano-1H-moene, 1,4.5,6,7,8,8-hep-
	tachioro-3a,4,7,7a-letranydro-
P066	Methomyl
	2-Methylazindine
P068	2-Methylazindine Methyl hydrazine
P068	Methyl hydrazine Methyl receipme
P068	Methyl hydrazine Methyl receipme
P068 P064 P069	Methyl hydrazine Methyl isocyanate 2-Muthyliactonima
P068 P064 P069	Metryl hydrazine Metryl recoverate 2-Mothylisctoritnie Metryl parathon
P068 P064 P069 P071	Methyl hydrazine Methyl isocyanate 2-Muthylactoritale Methyl parathion alpha-Nachthylthoranae
P068	Metrivi hydrazine Metrivi leocyarine Metrivi leocyarine Metrivi parathion alpha-Naphthythiourea Nickel carbornyi
P068	Methyl hydrazine Methyl socyanare 2-Muthyllactorintie Methyl paratition alpha-Naphthythiourea Nickel carbonyl Nickel carbonyl Nickel cyandia
P068	Methyl hydrazine Methyl socyanare 2-Muthyllactoninie Methyl parathon aloha-Naphthythioures Nickel carbonyl Nickel cyanide Nackel(III) cyanide
P068	Metri hydrazine Metri isovarine Metri isovarine Metri isovarine Metri parathon alpha-Naphthythioures Nickel cyanide Nickel (yanide Nickel (il) cyanide Nickel (il) cyanide
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P068	Methyl hydrazine Methyl socyanate 2-Muthyllactorithie Methyl parathon alpha-Naphthythiourea Nickel carbonyl Nickel (marke) Nickel (marke) Nickel (tracarbonyl Nickel (tracarbonyl Nicotine and saits Natric owide
PO68	Methyl hydrazine Methyl leocyarane Z-Muthyliscotownine Methyl parathion alpha-Naphthylthourea Nickel cyanide Nickel cyanide Nickel tracarbonyl
P068	Methyl hydrazine Methyl socyarate Authylisectoninie Methyl parathion alpha-Naphthythoures Nickel carbonyl Nickel cyanide Nickel (II) cyanide Nickel tetracarbonyl Nicotine and salzs Ninno oside p-Nirodanine Nitropan dioside
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P068	Methyl hydrazine Methyl leocyarane Z-Muthyliscotownine Methyl parathion alpha-Naphthylfhourea Nickel cyanide Nickel cyanide Nickel tracarbonyl Nickel tracarbonyl Nickel tracarbonyl Nickel tracarbonyl Nicotine and salts Nitro casee p-Naroansine Nitrogen(III) oxide Nitrogen(III) oxide Nitrogen(III) oxide Nitrogen(IV) oxide
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P068	Methyl hydrazine Methyl socyarane Jekutylisocyarane Methyl socyarane Methyl perathion sipha-Napithylthioures Nickel cyanids Nickel cyanids Nickel cyanids Nickel tetracarbonyl Nicotine and salts Nitro eaide Polytropinie Nitrogenilli oxida
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PO68 PO68 PO69 PO64 PO69 PO71 PO71 PO72 PO73 PO75 PO75 PO76 PO76 PO76 PO76 PO76 PO76 PO76 PO76	Methyl hydrazine Methyl isocyarane Methyl isocyarane Methyl parathion aipha-Naphthylthiourea Nickel cyanide Nickel cyanide Nickel cyanide Nickel cyanide Nickel cyanide Nickel etracarbornyl Nicotine and salts Nitro casce p-Nitrogenilli oste Nitrogenilli Nitr
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P068 P068 P068 P068 P068 P068 P068 P071 P072 P073 P074 P075 P075 P076 P076 P076 P076 P076 P076 P076 P076	Methyl hydrazine Methyl socyariate Methyl socyariate Methyl parathion alona-Naphthythiourea Nickel cyanide Nickel cyanide Nickel cyanide Nickel cyanide Nickel letracarbonyl Nickel tetracarbonyl Nitrogoniden N
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waste No.	
P044	Phosphorodithioid scid, O.O-dimethyl 5 [2-(metrylamma)-2-avorabyl)ssiar
P043	[2-(metrylammoj-2-ososthyl)esser Phosphorofluenc acid, bis(1-methylethyl ester
P094	Phosphorotheoic acid, C.O-diethyl : (ethyltho)methyl ester
P089	Phosphorothical said, O,O-dethyl O-(p-n trophenyl) ester
P040	Phospherothioc acid, O,O-diethyl O- pyn zinyt ester
	Phosphorothioic acid, O.O-dimethyl O-(
P110	Plumbane, tetraethyl-
P098	Potassium cyanide
P099	. Potassium silver cyaride
P070	_ Propanal, 2-methyl-2-(methylthio)-, ([(methylamino)carbonyl]oxime
P101	Propanentrile
P027	Propanentitile, 3-chloro-
	Propanentrile, 2-hydroxy-2-methyl-
	1.2.3-Propanetriol, trinitrate- (FI) 2-Propanone, 1-bromo-
	Propanional, regionos Propargyl alcohol
P003	2-Propenel
PODS	2-Propertal *
P067	_ 1,2-Propylenimine
P102	1,2-Propylenimne . 2-Propyl-1-ol . 4-Pyndinamine
P075	., мупакте, (5)-3-(1-metrryi-2-руттонакту)
P111	and saits Pyrophosphonc acid, tetraethyl ester
P103	_ Selenourea
P104	_ Silver cyanide
P105	Sodium azide
P106	Sodium cyanide Strontium suifide
	Strychnidin-10-one, and saits
	Strychridin-10-one, 2.3-dimethoxy-
P108	Strychnine and saits
P115	_ Sulfunc acid, thailium(I) satt .
P109	Tetraethyldithiopyrophosphate Tetraethyl lead
P111	_ letradityi leed Tetradityirganhaanhata
P112	Tetraethylpyrophosphate Tetrantromethane (R)
P062	Terrenhoushous and havesitud acted
P113	Theilic mode
P114	Thatismili) selente Thatismili) selente Thiotenox
P045	Thiofenox
P049	. Thiomidodicarbonic diamide
P014	Thiophenol
P116	Thiosemicarbazide
P072	Thiourea, (2-chiorophenyi)- Thiourea, 1-naonthalanyi-
Pnos	Thousand shows
P123	. Toxaphene Trichloromethanethiol Vanedic acid, ammonium salt
P118	Trichloromethanethiol
P119	. Vanadic acid, ammonium salt
P12U	. Vanacium pentoxide
P001	Vanadium(V) coide Wartson
P121	_ Zinc cyanide
P122	Zinc phosphide (FLT)
	· · · ·

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RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS Form B Generator Inspection* (40 CFR Part 262)

I. General Information:*

(A)	Installation Name:	Gates Rubber	
(B)	Street:	P. O. Box 1196Knoxville Ro	oad
(C)	City: Galesburg	(D) State:IL.	(E) Zip Code: 61401
(F)	Phone: 309/343-7171	(G) County: Knox	
(H)	Date of Inspection: 9/21	/81 Time of Inspection (Fro	m) 9:30 A.(To)10:10 A.
(I)	Weather Conditions:	70's, Clear	
(1)	Person(s) interviewed Robert Siebert	Title Quality Control Mgr.	Telephone 309/343-7171
	Robert Siebert	Quality Control Mg1.	303/343 /1/1
(K) ⁻	Inspection Participants	Agency/Title	Telephone
	Glenn Savage	I.E.P.A./EPS	217/786-6892
(L)	Preparer Information		
	Name	Agency/Title T	elephone
	Glenn Savage Hlenn Jan	I.E.P.A./EPS	217/786-6892
	-	U	

^{*}Do not use this form if Generator is also a treatment, storage, and/or disposal facility. Complete form "A" if the Generator is also a TSD facility.

II. BRIEFLY DESCRIBE SITE ACTIVITY

An Interim Status Standards Inspection was conducted on September 21, 1981, at the Gates Rubber Co. in Galesburg, IL. The site is generating a hazardous waste, thiuram, which has been reclassified from an acutely toxic waste to a hazardous waste. Also, 1,000 kilograms of the waste are not being generated per month. The facility is only concerned with a small amount of residue, which might be left on the container in which the raw material was kept. This facility is exempt from RCRA at this time.

III. MANIFEST REQUIREMENTS (Subpart B)

		, ,	•			
(A)		s the operator have copies the manifest available for	Yes	No	NI*	Remarks
	review?					
(B)	con (If rec	the manifest forms reviewed tain the following information? possible, make copies of, or ord information from, manifests t do not contain the critical ments)				
	1.	Manifest document number?				
	2.	Name, mailing address, telephone number, and EPA ID number of generator?	-	*********		
	3.	Name and EPA ID Number of transporter(s)?				
	4.	Name, Address, and EPA ID Number of designated permitted facility and alternate facility?			<u> </u>	

		Yes	No	NI*	Remarks	
	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?					
	6. The total quantity of waste(s) and the type and number of containers loaded?					
	7. Required certification?					
	8. Required signatures?			,	/	
(C)	Does the owner or operator submit exception reports when needed?		—,			
	IV. PRE-TRAN	TQNQ2	PEOUT	DEMENT	re	
	17. TRE-TRAIN	JI 0K1	Dr. QUI	KLMEIU	<u>3</u>	
(A)	Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	_				
(B)	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)	_	<u>\</u>			
(C)	If required, are placards available to transporter?					
(D) ^	Pre-shipment Accumulation:					
	1. Are containers marked with start of accumulation date?					
	2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	-	_	_		

		Yes	No	NI*	Remarks	
3.	Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?					·
4.	If wastes are stored in tanks, are the tanks managed according to the following requirements:			/		
	a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?		_/			·····
	b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	\checkmark	_			
	<pre>c. Do continuous feed systems have a waste-feed cutoff?</pre>		\ <u> </u>			
-	d. Are required daily and weekly inspections done?		7			
	e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)					
	f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	- ,				
	g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?					

	Record the following information:	
	Tank capacity? gallons	
	Tank diameter? feet	
	Distance of tank from property line? feet	
	(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)	
	V Training, Emergency Procedures	
	YES NO N1* Remarks	
A •	Do Personnel training records include: (Effective 5/19/81)	
	l. Job Titles?	
	2. Job Descriptions?	
	3. Description of training?	
	4. Records of training?	
	5. Have facility personnel received required training by 5-19-81?	
	6. Do new personnel receive required training within six months?	
В.	Prepardness and Prevention (Part 265, Subpart C)	
-	1. Maintenance and Operation of Facility.	
	a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	

2.	If required, does this facility have the following equipment?
	a. Internal communications or alarm systems?
	b. Telephone or 2-way Radios at the scene of operations?
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?
	Indicate the volume of water and/or foam available for fire control
3.	Testing and Maintenance of Emergency Equipment:
	a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
	b. Is emergency equipment maintained in operable condition?
4.	Has owner/operator provided immediate access to internal alarms (if needed)?
5.	Is there adequate aisle space for unobstructed movement?
Con	tingency Plan and Emergency Procedure (Part 265, Subpart D)

~ C.

Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)

- b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?
- c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

i	2. Are copies of the Contingency Plan available at site and local emergency organizations?
	3. Emergency Coordinator
	a. Is the facility emergency Coordinator identified?
	b. Is coordinator familiar with all aspects of site operation and emergency procedures?
	c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan? ———————————————————————————————————
	4. Emergency
	If an emergency situation has occured at this facility, has the emergency coordinator followed the emergency procdures listed in §265.56?
	VI. RECORDKEEPING AND REPORTING
	(Part 262, Subpart D)
(A)	Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?
(B) [^]	Has the generator submitted Annual Reports and Exception Reports as required?
	VII. INTERNATIONAL SHIPMENTS (Part 262 Subpart E)
(A)	Has the installation imported or exported hazardous waste?
•	